

**TECHNICAL REVIEW AND EVALUATION FOR SIGNIFICANT REVISION #43749  
TO  
OPERATING AIR QUALITY PERMIT #28161  
EL PASO NATURAL GAS CO. – SELIGMAN COMPRESSOR STATION**

**I. INTRODUCTION**

This Significant Permit Revision No. 43749 to Operating Permit No. 28161 to be issued to El Paso Natural Gas Company (EPNG) - Seligman Compressor Station incorporates a facility-wide nitrogen oxides (NO<sub>x</sub>) emission limit below the Prevention of Significant Deterioration (PSD) threshold. Additionally, the permit revision stipulates a monitoring strategy for EPNG to track compliance with the above mentioned voluntary limitation.

**A. Company Information**

Facility Name: El Paso Natural Gas Company

Mailing Address: P.O. Box 1087  
Colorado Springs, CO 80901-9906

Facility Address: 8 miles east of Seligman,  
Seligman, Yavapai County, Arizona 85337

**B. Attainment Classification**

El Paso Natural Gas company- Seligman Compressor Station is located in an area which is attainment or unclassified for criteria pollutants.

**C. Learning Sites Evaluation**

There are no learning sites within 2 miles of the facility.

**II. BACKGROUND INFORMATION**

The current Class I renewal permit no. 28161 was issued on April 21, 2004, for operation of natural gas fired General Electric turbine & Solar Mars 100 turbine for 8760 hours, and Generac Auxiliary Generator for 600 hours. The permit contains emission limits of 40.5 lb/hr, 10.5 lb/hr, and 7.3 lb/hr for the General Electric turbine, the Solar Mars 100 turbine, and the Generac Auxiliary Generator respectively to limit the facility-wide NO<sub>x</sub> emissions to 225.0 tons/year.

**III. REVISION DESCRIPTION**

To address the emission variability from their turbines and to demonstrate compliance with their PSD minor status, EPNG approached ADEQ to reset the NO<sub>x</sub> synthetic minor emission limits and associated monitoring strategy in Permit No. 28161. Through this permit revision, instead of lb/hour emission limitation for the turbines, the facility is permitted a facility-wide emission limitation of 225 tons/year of NO<sub>x</sub> with individual limits for the General Electric turbine & the Solar turbine at 0.69 pound/MMBtu for GE turbine and 0.10 pound/MMBtu respectively. These factors have been developed by the facility based on operating data collected over last 5 years and factoring in a margin

of safety. The permit revision stipulates a monitoring strategy, as described in Section VII below, for EPNG to track compliance with the above mentioned voluntary limitation.

#### **IV. APPLICABLE REQUIREMENTS**

There are no new applicable requirements.

#### **VI. AIR POLLUTION CONTROL REQUIREMENT**

There are no new air pollution control requirements.

#### **VII. MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

Following additional requirements are specified in the permit revision:

- A. The Permittee is required to conduct performance test for NO<sub>x</sub> emissions from GE turbine and Solar turbine on a semi-annual basis to demonstrate compliance with their respective emission standards.
- B. The Permittee is required to maintain monthly records of natural gas consumption on each turbine.
- C. Within 10 (ten) days of the end of each month, the Permittee is required to calculate the NO<sub>x</sub> emissions from the GE turbine and the Solar turbine for the previous month using the natural gas consumption for that month, the heating value of fuel gas and the emission factors of 0.69 pounds/MMBtu and 0.10 pounds/MMBtu respectively, and for the auxiliary generator using the number of hours of operation and the emission factor of 7.3 pounds/hour. Based on these calculations, the Permittee is required to maintain records of rolling 12-month combined emissions from the GE turbine, the Solar turbine and the auxiliary generator. If any 12-month rolling total of NO<sub>x</sub> emission exceeds 225 tons, the Permittee must report this as excess emission report.